REMARKS

The Office Action of September 2, 2005 was received and reviewed. Applicants would like to thank the Examiner for the consideration given to the above-identified application.

Filed concurrently herewith is a *Request for a One Month Extension of Time* which extends the shortened statutory period of response to January 3, 2006, as Monday January 2, 2006 was a Federal Holiday. Accordingly, Applicants respectfully submit that this response is being timely filed.

Claims 50-82 were pending prior to the instant amendment. By this amendment, claims 50, 62, 72, 76, 78 and 80 have been amended, claims 58-61 have been canceled herein, and new dependent claims 83-91 have been added. Consequently, claims 50-57 and 62-91 are currently pending in the instant application, of which claims 50, 52, 62, 65, 68, 70, 72, 74, 76, 78 and 80 are independent.

Referring now to the detailed Office Action, claims 50-53, 56-58, 61, 62, 64, 65, 67, 74-80 and 82 stand rejected under 35 U.S.C. §103(a) as being unpatentable over AAPA in combination with Yamada (U.S. Patent No. 6,246,179), Inoue et al. (U.S. Patent No. 6,218,206 – hereafter Inoue), So et al. ((U.S. Patent No. 5,853,905 – hereafter So), Garcia et al. (U.S. Patent No. 6,308,369 – hereafter Garcia), Farber et al. (U.S. Patent No. 6,187,684 – hereafter Farber) and further in view of Satoh et al. (U.S. Patent No. 4,819,334 – hereafter Satoh) and Sakata et al. ((U.S. Patent No. 6,120,584 – hereafter Sakata) and further in view of Montgomery et al. (U.S. Patent Application Publication No. 2002/0071995 – hereafter Montgomery). These rejections are respectfully traversed at least for the reasons provided below.

As presented in the Amendment filed May 11, 2005 and June 20, 2005, the presently claimed invention includes a protective film formed over a resin insulating film, which is formed over a thin film transistor, a wiring, and a pixel electrode in order to prevent a substrate over which the thin film transistor, the wiring, and the pixel electrode from problems such as contamination and electrostatic discharge damage. The presently claimed invention has a feature that is directed to not only forming the protective film but also forming the resin insulating film which contributes to the prevention of the aforementioned problems.

To further clarify and distinguish the presently claimed invention over the cited prior art references, Applicants have amended claims 50, 62, 65, 72, 76, 78 and 80 to specify that the substrate is removed after moving, and then the resin insulating film is etched.

In contrast with Applicants' claimed invention, although Satoh discloses that the protective film 10 is used for preventing an element formed over the substrate 1 from contamination, Satoh does not teach, disclose or suggest a film corresponding to the above-mentioned resin insulating film because the film 5 of Satoh is patterned before forming the protective film 10.

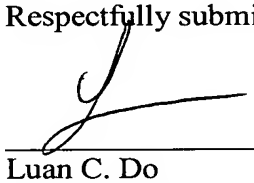
The requirements for establishing a *prima facie* case of obviousness, as detailed in MPEP § 2143 - 2143.03 (pages 2100-122 - 2100-136), are: first, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference to combine the teachings; second, there must be a reasonable expectation of success; and, finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. As Satoh does not teach, disclose Applicants' resin insulating film as recited in the pending claims, the combination of Satoh with the other cited prior art references is insupportable.

In addition to the amendments and arguments set forth above, the arguments submitted in the Amendment filed May 11, 2005 and June 20, 2005 in response to the Office Action mailed January 11, 2005 are also incorporate by reference herein by reference. Further, where the sequence of steps or the results obtained thereby is unsuggested by the prior art, a multi-step process is patentable even if the individual steps are taught. *Ex parte Bril et al.* (POBA 1958) 124 USPQ 509; *Ex parte Kane* (POBA 1959) 125 USPQ 70; *Ex parte Bond* (POBA 1961) 135 USPQ 160; *Trio Process Corp. v. L. Goldstein's Son's, Inc.* (CA 3 1972) 461 F2d 66, 174 USPQ 129.

New dependent claims 83-91 have been added to recite additional features of the present invention to which Applicants are entitled.

In view of the foregoing, it is respectfully requested that the rejections of record be reconsidered and withdrawn by the Examiner, that claims 50-57 and 62-82 be allowed, that new claims 83-91 be allowed and that the application be passed to issue. If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone the undersigned to arrange such a conference.

Respectfully submitted,



Luan C. Do
Registration No. 38,434

NIXON PEABODY LLP
Suite 900, 401 9th Street, N.W.
Washington, D.C. 20004-2128
(202) 585-8000